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The parties shall file a supplemental letter as soon as possible and no later than **December 9, 2021**, stating whether they have reached a settlement in principle. The Court does not ordinarily stay discovery or other proceedings because of ongoing settlement negotiations.

December 6, 2021

VIA ECF

Re:

Dated: December 7, 2021 New York, New York

Pascual v. Simply Gum, Inc.; Case No. 1:21-cv-05543-LGS

The Honorable Lorna G. Schofield United States District Judge Southern District of New York 40 Foley Square New York, New York 10007 Lorna G. Schofield

UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

We represent Defendant Simply Gum, Inc. ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from December 6, 2021 to January 20, 2022.

The requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, voluntary dismissal will be filed.

Accordingly, the parties do not need to participate in the upcoming mediation conference scheduled for December 8, 2021 at 10:00am (Dkt. #21) and respectfully request its cancellation.

Respectfully submitted,

<u>/s/ Karla Del Pozo García</u> Karla Del Pozo García

cc: All counsel of record (by ECF)